

CLYDE & CO US LLP

Paul R. Koepff
Leonard Sarmiento
200 Campus Drive, Suite 300
Florham Park, NJ 07932
Telephone: 973-210-6700
Facsimile: 973-210-6701
paul.koepff@clydeco.us
leonard.sarmiento@clydeco.us

-and-

CLYDE & CO CANADA LLP

Roderic C. McLauchlan (admitted *pro hac vice*)
Barry S. Stork (admitted *pro hac vice*)
401 Bay Street, Suite 2500
P.O. Box 25
Toronto, ON M5H 2Y4
Telephone: 416-366-4555
Facsimile: 416-366-6110
roderic.mclauchlan@clydeco.ca
barry.stork@clydeco.ca

*Attorneys for Defendants Certain Underwriters at Lloyd's, London
Subscribing to Policy No. QB078513 and Certain Underwriters at
Lloyd's, London Subscribing to Policy No. B0509FINMW1500609*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Plaintiffs,

v.

AIG INSURANCE COMPANY OF
CANADA, et al.,

Defendants.

Civil. No.: 3:18-CV-00493-MAS-LHG

**STIPULATION AND PROPOSED
CONSENT ORDER OF
VOLUNTARY DISMISSAL WITH
PREJUDICE AND WITHOUT COSTS**

WHEREAS, Plaintiffs Valeant Pharmaceuticals International, Inc., Valeant Pharmaceuticals International and AGMS, Inc. (collectively, "Plaintiffs") and Defendants Certain Underwriters at Lloyd's, London Subscribing to Policy No. QB078513, incorrectly named as

"Lloyd's Syndicate AWH 2232" and Certain Underwriters at Lloyd's, London Subscribing to Policy No. B0509FINMW1500609, incorrectly named as "Lloyd's Syndicate AWH 2232" ("AWAC") (collectively, the "Parties") have entered into a Confidential Settlement Agreement and Mutual Release effective May 27, 2021 (the "Settlement Agreement"); and

WHEREAS, through the Settlement Agreement, the Parties have resolved and settled all claims and disputes at issue between them in this matter; and

WHEREAS, AWAC has made the settlement payment contemplated by the Settlement Agreement; and

WHEREAS, Plaintiffs acknowledge the receipt and sufficiency of same; and

NOW, THEREFORE, it is hereby stipulated by the Parties and Ordered by the Court that all claims by Plaintiffs against AWAC and all counterclaims by AWAC against Plaintiffs are hereby DISMISSED WITH PREJUDICE AND WITH EACH PARTY BEARING ITS OWN COSTS AND ATTORNEYS' FEES. This stipulation does not apply to Plaintiffs' claims against any other Defendant in this litigation.

SO ORDERED AND ENTERED:

This ____ day of September, 2021

Hon. Michael A. Shipp, U.S.D.J.

CONSENTED BY:

MCCARTER & ENGLISH, LLP

By: /s/ Sherilyn Pastor

CLYDE & CO US LLP

By: /s/ Paul R. Koepff

Sherilyn Pastor
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102
(973) 622-4444

-and-

PROSKAUER ROSE LLP

John E. Failla
Nathan Lander
Om V. Alladi
11 Times Square
New York, NY 10036
(212) 969-3000

*Attorneys for Plaintiffs
Valeant Pharmaceuticals International, Inc.,
Valeant Pharmaceuticals International, and
AGMS, Inc.*

Dated: September 9, 2021

Paul R. Koepff
Leonard Sarmiento
200 Campus Drive, Suite 300
Florham Park, NJ 07932
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Dated: September 9, 2021